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12 Attorneys for Defendant,
13 GARRISON PROPERTY AND CASUALTY
14 INSURANCE COMPANY

15 EDWARD WHEELER,

16 Plaintiffs,

17 vs.

18 GARRISON PROPERTY AND CASUALTY
19 INSURANCE COMPANY, and DOES 1 to 25,
20 inclusive,

21 Defendants.

22 CASE NO. 2:23-cv-00623-TLN-AC

23 **JOINT STIPULATION AND ORDER TO
24 MODIFY SCHEDULING ORDER**

25 Plaintiff Edward Wheeler (“Wheeler”) and Defendant Garrison Property and Casualty
26 Insurance Company (“Garrison”) hereby agree and stipulate as follows:

27 **STIPULATION**

28 WHEREAS, on June 14, 2023, the Court granted the parties’ Joint Stipulation to Modify the
Initial Pretrial Scheduling Order (Dkt. 11), and set the following pertinent case management
deadlines:

1. Fact Discovery Cutoff: March 5, 2024

2. Expert Disclosures: May 3, 2024

1 3. Rebuttal Expert Disclosures: May 31, 2024

2 4. Supplemental Discovery Cutoff: July 31, 2024

3 5. Dispositive Motion Deadline: August 30, 2024

4 WHEREAS, the parties have been and continue to be diligently engaged in discovery,
5 including written discovery and the setting of necessary percipient depositions;

6 WHEREAS, based upon the discovery obtained to date, the parties are in the midst of
7 engaging in settlement discussions, and are hopeful the matter will resolve;

8 WHEREAS, the parties have agreed to proceed to Mediation and are in the process of
9 selecting a Mediator and setting a Mediation date in the coming months, as the Mediator and
10 counsel's schedules allow,

11 WHEREAS, the parties agree there is a greater likelihood settlement will be reached in this
12 matter with additional time, and with the avoidance of expending fees on retaining expert witnesses
13 and engaging in further discovery and potential motion practice;

14 WHEREAS, the parties believe that a second brief continuance of the case management
15 deadlines by roughly 120 days is warranted to allow for further settlement negotiations and
16 resolution of the matter;

17 WHEREAS, the parties have previously sought one time modification in this case;

18 WHEREAS, the parties agree they will not be prejudiced by the continuance of the
19 discovery deadlines in this case;

20 WHEREAS, based upon the foregoing the parties believe good cause exists for the
21 modification of the Court's June 14, 2023 Scheduling Order;

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1 THEREFORE, IT IS HEREBY STIPULATED THAT the parties, by and through their
2 counsel, jointly and respectfully request that the Court modify the case management deadlines in
3 this case as follows:

4 1. Fact Discovery Cutoff: July 3, 2024
5 2. Expert Disclosures: September 2, 2024
6 3. Rebuttal Expert Disclosures: May 31, 2024
7 4. Supplemental Discovery Cutoff: May 31, 2024
8 5. Dispositive Motion Deadline: December 27, 2024

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10 SO STIPULATED.

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12 Dated: January 29, 2024

DKM LAW GROUP, LLP

13
14 By: /s/Joshua N. Kastan
15 JOSHUA N. KASTAN
16 JESSICA J. ROSS
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22 GARRISON PROPERTY AND CASUALTY
23 INSURANCE COMPANY

24
25 Dated: January 29, 2024

26 GAVRILOV & BROOKS

27
28 By: /s/Matthew Richard*
29 OGNIAN GAVRILOV
30 HANNAH FERNANDEZ
31 MATTHEW RICHARD
32 **GAVRILOV & BROOKS**
33 2315 Capitol Avenue
34 Sacramento, CA 95816
35 Attorneys for Plaintiff
36 EDWARD WHEELER
37 *Signed with permission

ORDER

Pursuant to the parties' stipulation and good cause appearing, it is hereby ORDERED that the Scheduling Order as set on June 14, 2023 (Dkt. 11) is hereby modified as follows:

1. Fact Discovery Cutoff: July 3, 2024
2. Expert Disclosures: **September 3, 2024**
3. Rebuttal Expert Disclosures: **October 1, 2024**
4. Supplemental Discovery Cutoff: **October 1, 2024**
5. Dispositive Motion Deadline: December 27, 2024

ORDERED and dated this 29th day of February, 2024.

John - Hanley